

ADAM PAUL LAXALT  
 Attorney General  
 VIVIENNE RAKOWSKY  
 Deputy Attorney General  
 Nevada Bar No. 009160  
 State of Nevada  
 Office of the Attorney General  
 555 E. Washington Ave.  
 Suite 3900  
 Las Vegas, Nevada 89101  
 (702) 486-3103 (phone)  
 (702) 486-3416 (fax)  
 VRakowsky@ag.nv.gov

Attorneys for Defendants  
 Nevada State Athletic Commission,  
 Dr. Margaret Goodman,  
 and Marc Ratner

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

PATRICIA HARDING MORRISON, )  
 individually and in her capacity as Executor / )  
 Administrator of the estate of Tommy )  
 Morrison, a deceased individual, )  
 Plaintiff, )  
 vs. )  
 QUEST DIAGNOSTICS INCORPORATED, a )  
 Nevada domestic corporation; JOHN HIATT; )  
 an individual; DR. MARGARET GOODMAN, )  
 an individual; NEVADA STATE ATHLETIC )  
 COMMISSION; an unknown business entity; )  
 MARC RATNER, an individual. )  
 Defendants. )

Case No. 2:14-cv-01207-RFB-PAL

**DEFENDANTS NEVADA  
 STATE ATHLETIC  
 COMMISSION, MARC  
 RATNER, AND DR.  
 MARGARET GOODMAN'S  
 JOINDER TO QUEST  
 DIAGNOSTICS AND JOHN  
 HIATT'S MOTION TO STAY  
 FURTHER FILINGS ABSENT  
 LEAVE OF COURT PENDING  
 THE COURT'S DECISION ON  
 DEFENDANTS' PENDING  
 DISPOSITIVE MOTIONS**

Defendants Dr. Margaret Goodman, Nevada State Athletic Commission, and  
 Marc Ratner ("State Defendants") by and through their attorneys, Adam Paul  
 Laxalt, Attorney General, and his deputy, Vivienne Rakowsky, Deputy Attorney  
 General, hereby file their Joinder to Quest Diagnostic, Incorporated and John  
 Hiatt's, Ph.D.'s Motion to Stay Further Filings Absent Leave of Court Pending the  
 Court's Decision on Defendants' Pending Dispositive Motions (CD #268).

**STATEMENT OF JOINDER**

State Defendants hereby join, adopt, and incorporate herein the facts, legal arguments, and conclusions set forth in the Quest Defendants' Motion to Stay Further Filings Absent Leave of Court Pending the Court's Decision on Defendants' Pending Dispositive Motions with respect to State Defendants' Motion for Summary Judgment (CD #185).

**CONCLUSION**

For the reasons set forth above, State Defendants Join Quest Diagnostic, Incorporated and John Hiatt's Motion to Stay Further Filings Absent Leave of Court Pending the Court's Decision on Defendants' Pending Dispositive Motions (CD #268) while State Defendants' Motion for Summary Judgment (CD #185) is being considered by this Honorable Court.

Respectfully submitted this 30th day of September 2016.

ADAM PAUL LAXALT  
Attorney General

By: /s/ Vivienne Rakowsky  
Vivienne Rakowsky (Bar No. 009160)  
Deputy Attorney General

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of the Nevada Office of the Attorney General, and that on the 30th day of April, 2016, I did cause a true copy of **DEFENDANTS NEVADA STATE ATHLETIC COMMISSION, MARC RATNER, AND DR. MARGARET GOODMAN'S JOINDER TO QUEST DEFENDANTS' MOTION TO STAY FURTHER FILINGS ABSENT LEAVE OF COURT PENDING THE COURTS' DECISION ON DEFENDANTS' DISPOSITIVE MOTIONS (CD #268)** to be served via electronic service by the U.S. District Court CM/ECF system to the parties on the Electronic Filing System and e-mailed a courtesy copy and Certified US Mail a copy to Plaintiff as follows:

Patricia Harding Morrison  
P.O. Box 454  
Rose Hill, Kansas 67133  
tommyandtrishamorrison@yahoo.com; tommythedukemorrison@yahoo.com  
(Courtesy copy via email and US Certified Mail)

Faye Caldwell, Esq.  
Caldwell & Everson  
2777 Allen Parkway, Suite 950  
Houston, TX 77019  
(Via CM/ECF)

Keith A. Weaver, Esq.  
Lewis Brisbois  
6385 S. Rainbow, Blvd., #600  
Las Vegas, NV 89101  
(Via CM/ECF)

/s/Michele Caro  
An Employee of the Office of the Attorney General